

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALICIA HASLAM,

Plaintiff,

v.

SHUSTER LABORATORIES, INC.,

Defendant.

Civil Action No. 05-10809 RWZ

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiff Alicia Haslam and Defendant Shuster Laboratories, Inc. respectfully submit this joint motion to extend the discovery deadline from June 30, 2006 to September 30, 2006. As grounds for this Motion, the parties state that they have already taken the depositions of several of Defendant's employees and Plaintiff, but have additional depositions yet to be completed due to scheduling conflicts. In addition, both parties have produced additional documents in response to discovery requests since the initial depositions, and both parties may require additional deposition testimony relating to the same. The parties state that they will not be able to complete the necessary discovery prior to the current discovery deadline and the parties believe that there may be discovery issues that may require the intervention of the Court.

The parties also respectfully request that this Court extend the deadline for Plaintiff to designate expert witnesses and disclose expert reports until September 19, 2006, the deadline for Defendant to designate expert witnesses and disclose expert reports until October 9, 2006, the expert witness deposition deadline until October 31, 2006, the summary judgment deadline until November 30, 2006, and the deadline for oppositions to summary judgment until December 31, 2006.

The parties request that the Status Conference scheduled for August 31, 2006 be rescheduled at a date following conclusion of discovery.

SHUSTER LABORATORIES, INC.,

ALICIA HASLAM,

By its attorneys,

By her attorney,

HOLLAND & KNIGHT LLP

MCLEOD LAW OFFICES, PC

/s/ Liam T. O'Connell

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Dated: August 4, 2006

I hereby certify that this documents(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non registered participants on August 4, 2006.

/s/ Liam T. O'Connell, Esq.

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